## PARKER AND CARMODY, LLP ATTORNEYS AT LAW 850 THIRD AVENUE 14<sup>TH</sup> FLOOR NEW YORK, N.Y. 10022

DANIEL S. PARKER MICHAEL CARMODY CHRISTINA S. COOPER TELEPHONE: (212) 239-9777 FACSIMILE: (212) 239-9175 DParker @ParkerandCarmody.com

October 1, 2020

## By ECF

Hon. Nelson S. Roman United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

Re: United States v. Kassem Harris
19 Cr 746 (NSR)

Dear Judge Roman:

I, along with Joshua Horowitz, represent Mr. Harris. We have conferred with AUSA David Felton and we write with the consent of the Government requesting that the Court adjourn the motion schedule for 60-90 days.

It remains our current intention to file a suppression motion, but we are unable to do so until we meet with the defendant and further investigate this matter, which we have been unable to do so in the past few months.

Accordingly, we respectfully request that the Court extend the time for the defendant to file motions and consent to the exclusion of speedy trial time.

If the foregoing is acceptable to the Court, then we respectfully request that Your Honor "SO ORDER" this letter granting an extension.

Thank you for your consideration in this matter.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 10/1/2020

Respectfully,

/s/

Daniel S. Parker Joshua Horowitz

Deft's request for an extension of the motion schedule is granted on consent of the Gov't as follows: moving papers shall be filed Dec. 7, 2020; Govt's response shall be filed Jan. 7, 2021; and the reply shall be filed Jan. 21, 2021. The Status Conf. is adjourned from Jan. 8, 2021 until Feb. 26, 2021 at 1:00 pm. Clerk of Court requested to terminate the

motion (doc. 30). Final extension. Dated: Oct.1, 2020

Nelson S. Román, U.S.D.J.